



State of Vermont

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Department of Environmental Conservation
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Waste Management Division
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July 31, 2000

BERNIE BOUDREAU
AGRI-MARK INC
PO BOX 500
MIDDLEBURY VT 05753

RE: Site Management Activity Completed, Agri-Mark, Troy, Vermont (Site #95-1722)

Dear Mr. Boudreau:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has had the opportunity to respond to The Johnson Company's "Notice to the Land Record" letter report dated January 13, 2000. This report included a copy of the Notice of residual contamination placed in the Town of Troy land records, as well as a petition for giving the site a SMAC (Site Management Activity Completed) designation. As discussed below, the SMS agrees that a SMAC designation is warranted.

Environmental investigations commenced at this site following the March 19, 1995, discovery of 0.125 inches of free phase petroleum product in a leak detection monitoring. The immediate response was the removal of the older of two 10,000-gallon No. 6 fuel oil underground storage tanks (USTs). This UST was removed on March 24, 1995. Approximately 25 holes were found in the UST, including one that was 0.5 inches in diameter. Surrounding soils were grossly contaminated with petroleum. A total of 109 tons of petroleum contaminated soils were excavated and temporarily stored onsite. An onsite drinking water supply was found 90-feet downgradient from the release. This well was sampled and contained no evidence of contamination from an analysis using EPA Method 524.2. Three (3) groundwater monitoring wells were installed, and along with a preexisting well were sampled. Only one well contained significant contaminant concentrations, and that was 1,2,4-trimethylbenzene at levels above the Vermont Health Advisory. In July 1995, the 109 tons of petroleum contaminated soils were transported to MTS, Inc. in Chichester, New Hampshire for treatment via asphalt batching.

On April 22, 1997, following the closure of the facility, the other 10,000-gallon No. 6 fuel oil UST was removed. Several holes were also found in this UST, and additional soil contamination was encountered. Groundwater sampling of the four (4) groundwater monitoring wells indicated that there were no violations of the Vermont Groundwater Enforcement Standards for petroleum constituents - this included the "newly" instituted standard for 1,2,4-trimethylbenzene. Also, there were no detectable concentrations of total petroleum hydrocarbons (TPH) found in the groundwater samples.

Residual shallow (i.e., 0' to 2' below ground surface) soil contamination did pose a significant (i.e., greater than 1 in a million cancer risk from lifetime exposure) risk to human health. The contaminants of concern were benzo(a)pyrene and TPH. To address this issue, 38.43 tons of surficial petroleum contaminated soils were excavated and disposed as waste at Waste USA's certified lined landfill in Coventry, Vermont. These soils were removed to a depth of two (2) feet below ground surface in the unpaved portions of the former tank area. The excavated zone was backfilled with clean fill and compacted. Excavations did not occur in the paved areas. Analytical results indicated that elevated concentrations of TPH and benzo(a)pyrene were left in surficial soils beneath the paved areas.

(Over)

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In order to manage the risk from the residual soil contamination, a notice to the land record was prepared to inform future property owners. This notice includes a statement that additional information about the site is available at our office, and that the SMS must be contacted prior to conducting subsurface work in the contaminated area. This notice may only be updated or removed by the SMS.

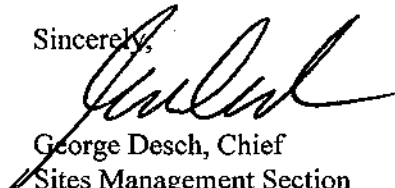
Based on the current conditions at this site, the SMS has determined that this site is now eligible for a SMAC designation. This means that the SMS has concluded the following:

- the two (2) No. 6 fuel oil USTs have been removed from the ground, and are no longer a continuing source of petroleum contamination at this site;
- 109 tons of grossly contaminated petroleum contaminated soil were excavated and treated via asphalt batching at MTS, Inc. in Chichester, New Hampshire, and another 38.43 tons of shallow petroleum contaminated soils were disposed at the Waste USA landfill in Coventry, Vermont;
- any significant residual groundwater contamination is limited to the immediate vicinity of the former USTs;
- the identified residual soil contamination is limited to the immediate vicinity of the former USTs and will be naturally attenuated over time; and
- any residual contamination does not pose an unacceptable risk to human health or the environment.

Based on the above, it appears that petroleum contamination was confined to the former UST locations and does not pose an unreasonable risk to human health and safety or to the environment. Therefore, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release Agri-Mark of any past or future liability associated with the petroleum contamination remaining in the ground from the removed USTs. It does, however, mean that the SMS is not requesting any additional work at this time.

If the monitoring wells are no longer used or maintained, then they must be properly closed to eliminate a possible conduit for contaminant migration into the subsurface. This closure typically involves filling the wells with a grout material to prevent fluid migration in the borehole. Specific requirements for well closure are outlined in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule-Chapter 21. Also, the road box or stand-up well guard for a monitoring well must be removed before well closure is considered complete. If you have any questions or comments, please feel free to contact either me or Matt Moran at 802-241-3888.

Sincerely,



George Desch, Chief
Sites Management Section

cc: Troy Selectboard
Troy Health Officer
DEC Regional Office
James Bowes, The Johnson Company

GD:mattm\wp1951722smac